

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT**

EPA Region 5 Records Ctr.



284920

**I. HEADING**

Date: 01/29/99  
Subject: Allied Paper, Kalamazoo Co., Kalamazoo, Michigan  
From: Brad Stimple, U.S. EPA OSC, ERB, Response Section 3

To: W. Carney, U.S. EPA, ERB Chief, Chicago, IL  
L. Nachowicz, U.S. EPA, ERB, RS3, Chicago, IL  
B. Messenger, U.S. EPA, ERB, Chicago, IL  
K. Mould, OSWER, Washington, D.C.  
L. Johnson, U.S. EPA, ORC, Chicago, IL  
S. Hill, U.S. EPA, OPA, Chicago, IL  
J. Hahnenberg, U.S. EPA, RPM, Chicago, IL  
S. Cornelius, Superfund Section, ERD, MDEQ, Lansing, MI  
P. Krause, Environmental Health Dept., Kalamazoo, Co., Kalamazoo, MI  
L. Williams, U.S. Fish & Wildlife, Lansing, MI

POLREP Number: POLREP 7

**II. BACKGROUND**

Site No.: 059B	Start (Mobilization) Date: 8/3/98
EPA/IAG ID#: DW96947885-01-0	Completion Date: Ongoing
Response Authority: CERCLA (ERB)	Demobilization Date: NA
CERCLIS No.: MID006007306	NPL Status: Listed - August 1990

**III. SITE INFORMATION**

**A. Incident Category**

CERCLA incident category: Inactive Production Facility (Paper Mill)

**B. Site Description**

**1. Site Location**

The Allied Paper site is an operable unit of a larger NPL Superfund Site known as the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (AP/PC/KR). The 51-acre Allied Paper site is located along Portage Creek in a residential and commercial area within the city limits of Kalamazoo, Kalamazoo County, Michigan. Portage Creek flows into the Kalamazoo River approximately 3-miles downstream. The Kalamazoo River empties into Lake Michigan approximately 80-miles downstream.

Specifically, the Bryant Mill Pond area of the Allied Paper site is the primary focus of the time-critical removal action. Portage Creek flows in a northerly direction through the Bryant Mill Pond area. The mill pond was formed when a dam at Alcott Street was in use and water was impounded to approximately the 790-foot contour interval elevation. The 22-acre Bryant Mill Pond is no longer impounded. What remains is an exposed floodplain containing PCB contaminated residual paper pulp waste, soil and sediment resulting from mill wastewater discharge to Portage Creek.

(SEE POLREP 1 FOR ADDITIONAL INFORMATION)

**2. Description of Threat**

(SEE POLREP 1 FOR DETAILED INFORMATION)

277419

**C. Preliminary Assessment/Site Inspection Results**  
(SEE POLREP 1 FOR DETAILED INFORMATION)

**IV. RESPONSE INFORMATION**

**A. Situation**

**1. Current Situation**

Warmer temperatures and rain events have led to very sloppy site conditions and higher than average creek levels. Because of the recent weather trends, progress has been reduced and even suspended for several days.

Excavation activities continue north of the "pinch-point" in the west flood plain and have progressed to the C grid line. Excavation on the east side of the creek has progressed to approx. the TT grid line. Excavation along the east floodplain continues with a modified approach. Grid node samples are collected ahead of the excavation and isolated areas are excavated based on PCB sample results. This method is being utilized in areas along the east floodplain which historically have shown low levels of contamination. The method will cease upon reaching larger depositional areas further north.

The creek bed within the first diversion area was excavated to approximately a 6-inch depth. The flow of Portage Creek has been placed back into it's original banks within the first diversion area. Preparations are complete to begin the second diversion.

Sheet piling has been installed in the middle of the creek from the Alcott Street Dam (north end of creek) south approximately 100' to the west bank of Portage Creek. The sheet pile will be utilized to split the creek flow allowing diversion at the dam and ultimate sediment removal.

Confirmation sampling of the excavation area on a 50' grid and chemical analysis continues without problems.

**2. Removal Activities to Date (01/09/99 to 01/29/99)**

The following removal activities have taken place during the reporting period:

1.) Approximately 63,000 cubic yards (CY) of PCB contaminated residual paper pulp waste and soil has been excavated from the Bryant Mill Pond (NOTE: POLREP 6 indicated, in error, that approx. 67,000 cy had been removed to date). Contaminated material is loaded into dump trucks and transported to lagoon #6 for consolidation.

2.) Confirmation sampling, re-excavation of hot spots as necessary, and backfill activities continue.

3.) Heavy equipment work within the consolidation area continues, helping to promote drainage of the contaminated material being placed there. Excess moisture drained from the consolidation area flows to lagoons #1 & #2 to be treated later.

4.) Surface water sampling and chemical analysis of upstream and downstream locations continues on an as needed basis. Real-time turbidity monitoring continues on a daily basis.

5.) Site crews have completed preparation of the second diversion (approx. 2,000', from grid line TT to AA). A temporary bridge has been constructed allowing loading and hauling of material from the east side. Creek diversion is planned for today. Two excavation crews will continue work on the east and west sides.

6.) Real-time personnel and perimeter air monitoring is being performed and recorded throughout each day. No problems exist to date.

7.) With the warmer temperatures this week, limited water treatment has continued. Water from lagoon #1 continues to be pumped to #2 where it is held before treatment.

### 3. Enforcement

U.S. EPA and the PRP for the Allied Paper Operable Unit (AP OU), have entered into a CERCLA 122(h) "cash-out" agreement. Pursuant to the terms of the agreement, the PRP will pay \$7.5 million to fund a U.S. EPA time - critical removal action at the Bryant Mill Pond portion of the AP OU of the AP/PC/KR NPL site. In exchange for the payment, the PRP will receive certain covenants not to sue under CERCLA.

(SEE POLREP 1 FOR DETAILED INFORMATION)

#### B. Planned Removal Activities

- \* Excavate contaminated soil and residual paper pulp waste from the Bryant Mill Pond (790 contour).
- \* Transport material to consolidation area. Solidify and grade waste as necessary.
- \* Perform confirmation sampling. Backfill excavation area.
- \* Dewater excavation area as necessary. Treat water on-site and discharge as necessary.
- \* Perform personnel and perimeter air monitoring throughout project.
- \* Maintain site haul roads.
- \* Cover consolidation area as appropriate.
- \* Perform restoration activities of the Bryant Mill Pond as appropriate.

#### C. Next Steps (for next reporting period)

- \* Begin sediment removal work directly in front of the dam on west side
- \* Continue excavation of east and west floodplain.
- \* Treat, sample and discharge contaminated water (weather permitting).
- \* Continue confirmation sampling and backfill activities.
- \* Continue surface water sampling and turbidity monitoring.

#### D. Key Issues

Upon discussions between site personnel, MDEQ and PRP representatives, it was determined that the two existing coffer dams located directly in front of the Alcott Street Dam can be removed. A vac truck will be used to remove potentially contaminated sediment existing within the structures before removing them.

#### V. COST INFORMATION (approximate totals as of 01/29/99)

	CEILING	COSTS
U.S. ACE (Weston)	\$5,500,000	\$3,070,815
U.S. EPA	\$ 150,000	\$ TBD

#### VI. DISPOSITION OF WASTES

No off-site disposal of waste planned.